



MAY 30 2018

May 23, 2018

VIA CERTIFIED MAIL

Brent Bowman
San Diego City
2392 Kincaid Rd
San Diego, CA 92101

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mayor Kevin L. Faulconer
202 C. Street
San Diego, CA 92101

**Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter
Violations of General Industrial Permit at North City Water Reclamation Plant**

Dear Mr. Bowman:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) and San Diego Coastkeeper (Coastkeeper) regarding San Diego City's (City's) violations of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (General Industrial Permit).¹

This letter constitutes CERF and Coastkeeper's notice of intent to sue for violations of the Clean Water Act and General Industrial Permit for City's North City Water Reclamation Plant facility located at 4949 Eastgate Mall, San Diego, CA 92121 ("NCWRP Facility" or "Facility"), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of City's Clean Water Act violations and CERF and Coastkeeper's intent to sue.

I. Citizen Groups

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and

¹ On April 1, 2014, the State Water Resources Control Board adopted Order No. 2014-0057-DWQ, which amends the Industrial General Permit ("New Industrial Permit"). These amendments became effective on July 1, 2015. All references to the General Industrial Permit are to the Permit as it existed at the time of the violations noted herein.

defense of the environment, the wildlife, and the natural resources of the California Coast. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024.

Coastkeeper is a nonprofit organization committed to protecting and restoring the San Diego region's water quality and supply. A member of the international Waterkeeper Alliance, Coastkeeper's main purpose is to preserve, enhance, and protect San Diego's waterways, marine sanctuaries, coastal estuaries, wetlands, and bays from illegal dumping, hazardous spills, toxic discharges, and habitat degradation. Coastkeeper implements this mission through outreach, education, activism, participation in governmental hearings, and prosecuting litigation to ensure that San Diego's beaches, bays, coastal waters and tributary streams and rivers meet all substantive water quality standards guaranteed by Federal, State, and local statutes and regulations. Coastkeeper's office is located at 2825 Dewey Road, Suite 207 in San Diego, California 92106.

Members of CERF and Coastkeeper use and enjoy the waters into which pollutants from City's ongoing illegal activities are discharged, namely San Clemente Creek, Rose Creek, Mission Bay, and eventually the Pacific Ocean (Receiving Waters). The public and members of CERF and Coastkeeper use these Receiving Waters to fish, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the NCWRP Facility affects and impairs each of these uses. Thus, the interests of CERF and Coastkeeper's members have been, are being, and will continue to be adversely affected by City Owners and/or Operators' failure to comply with the Clean Water Act and the General Industrial Permit.

II. Storm Water Pollution and the General Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the General Industrial Permit in order to lawfully discharge.

City Owners and/or Operators conduct wastewater treatment operations at the NCWRP Facility, including influent screening and grit removal, primary sedimentation, flow equalization, biological treatment, secondary clarification, tertiary treatment, demineralization, and chlorination. In addition, City Owners and/or Operators operate a chemical storage facility, odor control facilities, and a co-generation facility at the NCWRP Facility (SWPPP, Section 2.2.). The Facility SIC Code is 4952, Sewerage Systems.

City enrolled as a discharger subject to the General Industrial Permit on April 15, 1998 for its NCWRP Facility located at 4949 Eastgate Mall, San Diego 92121. City enrolled under the New Industrial Permit on June 3, 2016, WDID Number 9 371013897.

Pursuant to Section C(1) of the General Industrial Permit, a facility operator must comply with all conditions of the General Industrial Permit. (See New Industrial Permit, §I.A.8. [dischargers must "comply with all requirements, provisions, limitations, and prohibitions in this General Permit."]). Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, § C.1; New Industrial Permit §XXI.A.). Any non-compliance further exposes an owner/operator to an (a)

enforcement action; (b) General Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of a General Industrial Permit renewal application. As an enrollee, City has a duty to comply with the General Industrial Permit and New Industrial Permit and is subject to all of the provisions therein.

B. Failure to Monitor and Report

City Owners and/or Operators have failed to monitor and report data as required under the Industrial Permit and New Industrial Permit. Under the New Industrial Permit, City is required to sample four Qualifying Storm Events (QSEs) during the reporting year for all discharge locations. (New Industrial Permit, §XI.B.).

City Owners and/or Operators failed to sample the required number of QSEs during the 2016-2017 reporting year for all discharge locations. Thus, City Owners and/or Operators are in violation of the monitoring and reporting requirements of the New Industrial Permit.

City Owners and/or Operators have also failed to file accurate annual reports as required under the Industrial Permit and New Industrial Permit. Under the Industrial Permit and New Industrial Permit, City is required to submit an Annual Report to the Regional Board that includes a summary of visual observations and sampling results, an evaluation of the visual observation and sampling results, the laboratory reports of sample analysis, the annual comprehensive site compliance evaluation report, and an explanation of why a permittee did not implement any activities required. (Industrial Permit, §B.13-14; New Industrial Permit, §XVI.)

City Owners and/or Operators have failed and continue to fail to submit annual reports that comply with the Industrial Permit and New Industrial Permit reporting requirements. For example, in the Facility's 2013-2014, 2014-2015, 2015-2016, and 2016-2017 Annual Reports, the Facility Owners and/or Operators certify that: (1) a complete Annual Comprehensive Site Compliance Evaluation was conducted as required by the Storm Water Permit; (2) the SWPPP's BMPs address existing potential pollutant sources; and (3) the SWPPP complies with the Storm Water Permit, or will otherwise be revised to achieve compliance. However, information available to CERF and Coastkeeper indicates that these certifications are erroneous. For example, storm water samples collected from the Facility contain concentrations of pollutants above EPA Benchmarks and WQSs, thus demonstrating that the Facility BMPs do not adequately address existing potential pollutant sources. Further, the 2015-2016 and 2016-2017 Annual Reports state that the following parameters are not present at Facility: dissolved oxygen, enterococcus, nutrients such as nitrogen and phosphorous, turbidity, and metals such as copper, zinc, cadmium, selenium, and lead. However, the Facility's contemporaneous SWPPP acknowledges that bacteria, nutrients, fertilizers, turbidity-related suspended solids¹, and metals are present at the Facility, and that dissolved oxygen is present in the Facility aeration basin. (See SWPPP, Sections 2.2., 3.1.). Further, as discussed herein, the Facility's SWPPPs do not include many elements required by the Storm Water Permit, and thus it is erroneous to certify that the SWPPPs comply with the Storm Water Permit.

Further, the General Industrial Permit and New Industrial Permit require monitoring for pollutants associated with industrial activities. (New Industrial Permit, §XI.B.6.). The Facility SWPPP Potential Pollutant Source Summary Table identifies nutrients, fertilizers, metals, dissolved minerals, and

¹ See Turbidity, Total Suspended Solids, and Water Clarity, *available at* <https://www.fondriest.com/environmental-measurements/parameters/water-quality/turbidity-total-suspended-solids-water-clarity/>.

dissolved oxygen in site runoff, yet City Owners and/or Operators have consistently failed to sample for these parameters during all sampling events. (See SWPPP, Section 3.1.).

City Owners and/or Operators had numerous opportunities to sample but failed to do so. (See Exhibit A). Every day City Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing and City Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. City Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. § 1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

C. The NCWRP Facility Discharges Contaminated Storm Water in Violation of the General Industrial Permit

City Owners and/or Operators' monitoring reports indicate consistent exceedances and violations of the General Industrial Permit. Discharge Prohibition A(2) of the General Industrial Permit and New Industrial Permit Sections III.C-D prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance.

Effluent Limitation B(3) of the General Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of BMPs that achieve Best Available Technology Economically Achievable ("BAT") for toxic and non-conventional pollutants and Best Conventional Pollutant Control Technology ("BCT") for conventional pollutants. The New Permit includes the same effluent limitation. *See* 2015 Permit, Effluent Limitation V(A).

Information available to CERF and Coastkeeper, including via review of publicly available information and observations, indicates BMPs that achieve BAT/BCT have not been developed and/or implemented at the Facility. Consistent with CERF and Coastkeeper's review of available information and direct observations, the analytical results of storm water sampling at the Facility demonstrate that City Owners and/or Operators have failed and continue to fail to develop and/or implement BAT/BCT and achieve compliance with BAT/BCT standards, as required. Specifically, Facility discharges have exceeded EPA Benchmarks for numerous pollutants. EPA Benchmarks are relevant and objective standards for evaluating whether a permittee's BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the 1997 Permit and Effluent Limitation V(A) of the 2015 Permit.²

Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges which cause or contribute to an exceedance of any water quality standards or applicable Basin Plan water quality standards. (See New Industrial Permit Receiving Water Limitations VI.A-C). In addition, Receiving

² *See United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) Authorization to Discharge Under the National Pollutant Discharge Elimination System*, as modified effective February 26, 2009, Fact Sheet at 106; *see also*, 65 Federal Register 64839 (2000).

Water Limitation VI.C. of the New Industrial Permit prohibits discharges that contain pollutants in quantities that threaten to cause pollution or a public nuisance.

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards. (General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(1)(C); New Industrial Permit, §XX.B.). City Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Facility's SWPPP pursuant to General Industrial Permit section (C)(3) and New Industrial Permit Section X.B.1.

As demonstrated by sample data submitted by City, from enrollment through the present, City Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of water quality prohibitions and limitations during every significant rain event. The NCWRP Facility's sampling data reflects numerous discharge violations (see Exhibit B). City's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the NCWRP Facility continuously discharges contaminated storm water during rain events which have not been sampled.

D. Inadequate Storm Water Pollution Prevention Plan

One of the main requirements for the General Industrial Permit is the Storm Water Pollution Prevention Plan (SWPPP). (General Industrial Permit §A; New Industrial Permit §X.). City has not developed an adequate SWPPP as required by the General Permit or New Industrial Permit, with many of the required elements noticeably absent from the NCWRP Facility SWPPP. (New Industrial Permit, §X.A.1-10).

The latest NCWRP SWPPP, dated July 2015 and revised on 12-19-2017, fails to adequately assess the Facility's potential contribution of pollutants for which the Receiving Waters (San Clemente Creek, Rose Creek, and Mission Bay) are impaired. Rose Creek is on the 303(d) list as impaired for selenium and toxicity. The mouth of Rose Creek is on the 303(d) list as impaired for lead and for eutrophic conditions (nutrients). SDCK monitoring data, reported in CEDEN, shows Rose Creek is impaired for bacteria. Also, the Mission Bay Shoreline at Campland, near the mouth of Rose Creek, is on the 303(d) list as impaired for *Enterococcus*, Fecal Coliform, and Total Coliform. However, the Facility SWPPP fails to identify any impairments. Further, the Facility SWPPP fails to acknowledge the Facility's potential contribution of nutrients and bacteria, including *Enterococcus*, Fecal Coliform, and Total Coliform, which are often associated with wastewater treatment activities.

The latest SWPPP also fails to account for the numerous and repeated violations identified by City's monitoring data – ensuring these violations continue. The SWPPP is therefore inadequate. (See New Industrial Permit §I.E.37. ["Compliance with water quality standards may, in some cases, require Dischargers to implement controls that are more protective than controls implemented solely to comply with the technology-based requirements in this General Permit."])).

Every day City Owners and/or Operators operate the Facility without an adequate SWPPP is a separate and distinct violation of the General Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). City Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit and New Industrial Permit since at least May 23, 2013. These violations are ongoing and City Owners and/or Operators will continue to be in violation every day they fail provide an adequate SWPPP for the Facility. Thus, City Owners and/or Operators are liable for civil penalties of up to \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Unauthorized Non-Storm Water Discharges

Except as authorized by Section IV of the New Industrial Permit, permittees are prohibited from discharging materials other than storm water (non-storm water discharges) either directly or indirectly to waters of the United States. (New Industrial Permit, §III.B.; IV.A-B).

Information available to CERF and Coastkeeper indicates that unauthorized non-storm water discharges occur at the Facility due to inadequate BMP development and/or implementation necessary to prevent these discharges. For example, unauthorized non-storm water discharges occur from the Facility's screen washing activities, landscape irrigation overspray, spilled/leaked sewage, sludge, and chemicals, leaks from vehicles, and leaks from industrial activities when transferring/storing/maintaining bulk chemical areas. City Owners and/or Operators conduct these activities without BMPs to prevent related non-storm water discharges. Non-storm water discharges resulting from washing, irrigation, and leaks do not qualify as authorized non-storm water discharges in Section IV.A. of the Permit without implementation of BMPs and if in violation of a Regional permit. Notably, the San Diego Regional Municipal Separate Storm Sewer System (MS4) Permit Section E.2.a. prohibits the discharge of unauthorized non-storm water as an illicit discharge. Wash water is not listed among the authorized non-storm water discharges. (MS4 Permit, Section E.2.a.(3),(4)).

These discharge violations are ongoing and will continue until City Owners and/or Operators develop and implement BMPs that prevent prohibited non-storm water discharges or obtain separate NPDES permit coverage. Each time City Owners and/or Operators discharge prohibited non-storm water in violation of Discharge Prohibition III.B. of the Permit is a separate and distinct violation of the Storm Water Permit and section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). CERF will update the number and dates of violations when additional information becomes available. City Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since May 23, 2013.

III. Remedies

Upon expiration of the 60-day period, CERF and Coastkeeper will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF and Coastkeeper are willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF and Coastkeeper will move forward expeditiously with litigation.

City must develop and implement an updated SWPPP, install BMPs to address the numerous and ongoing water quality violations, and implement a robust monitoring and reporting plan. Should City Owners and/or Operators fail to do so, CERF and Coastkeeper will file an action against City for its prior, current, and anticipated violations of the Clean Water Act. CERF and Coastkeeper's action will seek all remedies available under the Clean Water Act § 1365(a)(d). CERF and Coastkeeper will seek the maximum penalty available under the law which is \$37,500 per day for violations prior to November 2, 2015, and \$51,570 per day for violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF and Coastkeeper may further seek a court order to prevent City from discharging pollutants.

Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF and Coastkeeper will seek to recover all of their costs and fees pursuant to section 505(d).

IV. Conclusion

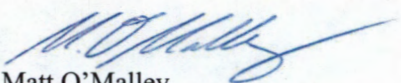
CERF and Coastkeeper have retained legal counsel to represent it in this matter. Please direct all communications to CERF and Coastkeeper's legal counsel:

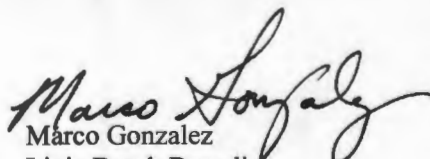
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If you wish to pursue settlement discussions in the absence of litigation, please contact Coast Law Group LLP and San Diego Coastkeeper immediately.

Sincerely,


Matt O'Malley
Josh Brooks
Attorneys for San Diego Coastkeeper


Marco Gonzalez
Livia Borak Beaudin
Attorneys for Coastal Environmental
Rights Foundation

SERVICE LIST

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Robert Relph
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David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
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San Diego, California 92108

Exhibit A - Precipitation Data

STATION	NAME	LATITUDE	LONGITUDE	ELEVATION	DATE	PRCP
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/11/2013	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/26/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/9/2013	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/28/2013	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/29/2013	0.16
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/3/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/5/2013	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/7/2013	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/19/2013	0.34
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/6/2014	0.2
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/28/2014	0.51
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	8/20/2014	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/1/2014	0.25
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/21/2014	0.01
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/31/2014	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/11/2015	0.2
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/12/2015	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/26/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/31/2015	0.01

Exhibit A - Precipitation Data

USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/22/2015	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/23/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/28/2015	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/1/2015	0.68
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/2/2015	0.25
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/25/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/7/2015	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/8/2015	0.46
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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/21/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/22/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/23/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	6/30/2015	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/1/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/18/2015	1.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/19/2015	0.66
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	7/21/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	8/25/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/15/2015	1.21
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/16/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/4/2015	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/5/2015	0.27
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/18/2015	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/3/2015	1.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/4/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/9/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/10/2015	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/15/2015	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/25/2015	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/26/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2015	0.18
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/11/2015	0.19
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/13/2015	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/19/2015	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/21/2015	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/22/2015	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/23/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/24/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/25/2015	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/28/2015	0.19
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/4/2016	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/5/2016	1.65
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/6/2016	0.61
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/7/2016	0.56
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/8/2016	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/15/2016	0.04

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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/18/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/30/2016	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/31/2016	0.14
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/18/2016	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/5/2016	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/6/2016	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/7/2016	0.45
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/11/2016	0.15
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/30/2016	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/7/2016	0.31
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/8/2016	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/9/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/10/2016	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/5/2016	0.09
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/6/2016	0.34
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/30/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/19/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/20/2016	0.15
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/21/2016	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/24/2016	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	10/30/2016	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/20/2016	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/21/2016	0.12
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/26/2016	0.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2016	0.17
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/28/2016	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/15/2016	0.12
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/16/2016	1.2
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/21/2016	0.54
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/22/2016	0.56
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/23/2016	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/24/2016	0.6
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/30/2016	0.51
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/31/2016	0.68
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/5/2017	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/9/2017	0.18
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/11/2017	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/12/2017	0.32
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/13/2017	0.35
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/19/2017	0.19
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/20/2017	1.11
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/21/2017	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/22/2017	0.35
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/23/2017	0.22
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/24/2017	0.05
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/6/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/7/2017	0.11

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USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/11/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/17/2017	1.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/18/2017	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/19/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/26/2017	0.06
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/27/2017	2.34
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/5/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/22/2017	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/17/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/6/2017	0.1
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/7/2017	0.79
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/10/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/15/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	6/11/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/3/2017	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/8/2017	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	9/9/2017	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	11/27/2017	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	12/20/2017	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/8/2018	0.16
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/9/2018	1.57
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/10/2018	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/19/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	1/25/2018	0.02
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/22/2018	0.04
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	2/27/2018	0.32
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/3/2018	0.23
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/4/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/10/2018	0.36
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/14/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/15/2018	0.07
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	3/17/2018	0.27
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/19/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	4/30/2018	0.01
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/1/2018	0.03
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/2/2018	0.08
USW00023188	SAN DIEGO INTL AIRPORT, CA	32.7336	-117.1831	4.6	5/12/2018	0.01

Exhibit B - North City Water Reclamation Plant Storm Water Sampling Violations

Date	Monitoring Location Latitude	Monitoring Location Longitude	Parameter	Result	Units	Benchmark/WQO	Magnitude of Exceedance	Benchmark/NAL	Magnitude of Exceedance
2/27/2014	SDR2-1 INF		Fecal Coliform	490	MPN/100mL	400	1	400	1
4/1/2014	SDR2-1 INF		Fecal Coliform	1700	MPN/100mL	400	4	400	4
4/1/2014	SDR1-1		Total Suspended Solids (TSS)	129	mg/L	100	1	100	1
12/12/2014	SDR1-1 EQ		Total Coliform	220000	MPN/100mL	10,000	22	10,000	22
12/12/2014	SDR2-1 INF		Total Coliform	140000	MPN/100mL	10,000	14	10,000	14
12/12/2014	SDR1-1		Total Suspended Solids (TSS)	253	mg/L	100	3	100	3
12/16/2014	SDR2-1 INF		Total Coliform	13000	MPN/100mL	10,000	1	10,000	1
9/15/2015	32.87782	-117.19779	E.coli	620	MPN/100mL	235	3	235	3
9/15/2015	32.87782	-117.19779	E.coli	1220	MPN/100mL	235	5	235	5
9/15/2015	32.87782	-117.19779	Total Coliform	579400	MPN/100mL	10,000	58	10000	58
9/15/2015	32.87782	-117.19779	Total Coliform	115300	MPN/100mL	10,000	12	10000	12
9/15/2015	32.87782	-117.19779	Total Suspended Solids (TSS)	103	mg/L	100	1	100	1
9/15/2015	32.87782	-117.19779	Total Suspended Solids (TSS)	170	mg/L	100	2	100	2
9/15/2015	32.87782	-117.19779	pH	6.46	SU	Not < 6.5 or > 8.5	0	Not < 6.0 or > 9.0	
12/22/2015	32.87782	-117.19779	Total Coliform	34480	MPN/100mL	10,000	3	10000	3
12/22/2015	32.87782	-117.19779	Total Coliform	46110	MPN/100mL	10,000	5	10000	5
4/7/2016	32.87782	-117.19779	Total Coliform	186000	MPN/100mL	10,000	19	10000	19
4/7/2016	32.87782	-117.19779	Total Coliform	117800	MPN/100mL	10,000	12	10000	12
5/6/2016	32.87782	-117.19779	Total Coliform	16640	MPN/100mL	10,000	2	10000	2
5/6/2016	32.87782	-117.19779	Total Coliform	67700	MPN/100mL	10,000	7	10000	7
5/6/2016	32.87782	-117.19779	pH	6	SU	Not < 6.5 or > 8.5	1	Not < 6.0 or > 9.0	
9/20/2016	32.87782	-117.19779	pH	6	SU	Not < 6.5 or > 8.5	1	Not < 6.0 or > 9.0	
9/20/2016	32.87782	-117.19779	pH	6	SU	Not < 6.5 or > 8.5	1	Not < 6.0 or > 9.0	
12/16/2016	32.87782	-117.19779	pH	6.27	SU	Not < 6.5 or > 8.5	0	Not < 6.0 or > 9.0	
12/16/2016	32.87782	-117.19779	pH	6.45	SU	Not < 6.5 or > 8.5	0	Not < 6.0 or > 9.0	
12/30/2016	32.87782	-117.19779	Total Coliform	51720	MPN/100mL	10,000	5	10000	5
1/5/2017	32.87782	-117.19779	Total Coliform	68670	MPN/100mL	10,000	7	10000	7
1/5/2017	32.87782	-117.19779	Total Coliform	29870	MPN/100mL	10,000	3	10000	3

Exhibit B - North City Water Reclamation Plant Storm Water Sampling Violations

Date	Monitoring Location Latitude	Monitoring Location Longitude	Parameter	Result	Units	Benchmark/WQO	Magnitude of Exceedance	Benchmark/NAL	Magnitude of Exceedance
1/9/2017	32.87782	-117.19779	Total Coliform	11870	MPN/100mL	10,000	1	10000	1
1/9/2017	32.87782	-117.19779	Total Coliform	10190	MPN/100mL	10,000	1	10000	1
1/9/2017	32.87782	-117.19779	pH	6	SU	Not < 6.5 or > 8.5	1	Not < 6.0 or > 9.0	
3/22/2017	32.87782	-117.19779	Total Coliform	43520	MPN/100mL	10,000	4	10000	4
3/22/2017	32.87782	-117.19779	Total Coliform	137600	MPN/100mL	10,000	14	10000	14
1/9/2018	32.87782	-117.19779	E.coli	399	MPN/100mL	235	2	235	2
1/9/2018	32.87782	-117.19779	E.coli	246	MPN/100mL	235	1	235	1
1/9/2018	32.87782	-117.19779	Total Coliform	22000	MPN/100mL	10,000	2	10000	2
2/27/2018	32.87782	-117.19779	Total Coliform	22000	MPN/100mL	10,000	2	10000	2